



EXECUTIVE BOARD

Sy Demsky, MA
John Phillips
Co-Presidents

Robert Sage, PhD
First Vice President

Joe Luniewicz
Second Vice President

Valerie Walters, MBA
Treasurer

Joycelyn Woods, MA
Steven Rabinowitz
Co-Secretaries

BOARD OF DIRECTORS

Joseph Adams, MD
W. Calvin Anderson, MEd
Valentin Bonilla, Jr., PA
H. Westley Clark, MD, JD
Juan Colon
David Cruz
Brenda Davis, MSW
Robert Krauss
David Lichtenstein
Robert Lubran, MPA
Dan McGill
Philip Paris, MD
Desire Renaud, EdD
Joan E. Standora, PhD
Valerie Walters, MBA
Kathleen Yee, Esq.

ADVISORY COMMITTEE

Melissa Freeman, MD
David Hutson, MSW
Steven Magura, PhD
Denise McIntee
David M. Novick, MD
Andrew Rosenblum, PhD
Alex Wodak, MD

IN MEMORIAM

Kathleen Coughlin (2015-2019)
John Galea (2013-2018)
Herman Joseph, PhD (2002-2019)
Elizabeth Khuri, MD (2002-2017)
Robert Newman, MD (2002-2018)
Beny Primm, MD (2002-2015)
Barry Stimmel, MD (2002-2015)

STOP STIGMA NOW is an independent
501-c3 non-profit organization

Stop Stigma Now Statement on the Opioid Treatment Access Act Of 2022, H.R. 6279

RESTRICTIONS ON DISPENSING METHADONE FOR TAKE-HOME USE
SHOULD NOT BE CODIFIED IN STATUTE

February 24th, 2022

Stop Stigma Now (www.StopStigmaNow.org) greatly appreciates that H.R. 6279, the Opioid Treatment Access Act of 2022, will significantly increase access to treatment for opioid use disorder by reducing barriers to the provision of methadone. This will lead to a significant improvement in the quality of life, and of mortality, among people living with opioid use disorder.

However, we are writing to express great concern regarding Section 3 (c) (3) Second regulation.- (B) Limitation.-

This codifies in statute, for the first time, a particular schedule for dispensing methadone for take-home use, which currently exists only in regulation. We oppose codifying specific and detailed clinical practices in statute because this makes them very difficult to modify in the future, if needed as new information may become available.

Approaches for dispensing methadone for take-home use are currently active areas of discussion and research. These practices also vary in nations outside of the U.S., sometimes specified in clinical practice guidelines rather than in regulation.

Following is the relevant section of the bill:

Section 3 (c) (3) (A):

In general.-

Not later than two years after the date of enactment of this Act, the Secretary of Health and Human Services shall promulgate a final regulation amending paragraphs (i)(3)(i) through (i)(3)(vi) of section 8.12 of title 42, Code of Federal Regulations, as appropriate based on the findings of the study under paragraph (2).

Section 3 (c) (3) (B):

Limitation.-

The regulation under subparagraph (A) (A) shall not amend section 8.12 of title 42, Code of Federal Regulations, so as to—

(i) allow the dispensing of more than two consecutive doses of methadone for take-home use per week before the patient’s 30th day of treatment;

MEDICATION ASSISTED TREATMENT FOR OPIOID ADDICTION SAVES LIVES

2 WASHINGTON SQUARE SUITE #2A LARCHMONT, NY 10538 914-318-4442 STOPSTIGMANOW.ORG